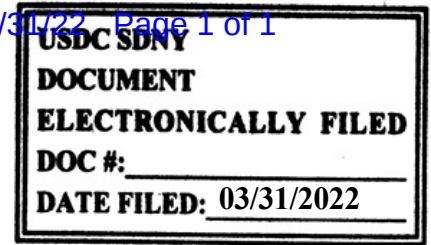


**PAUL**  
**HASTINGS**



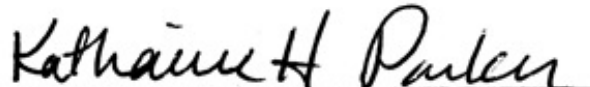
1(212) 318-6405  
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March 30, 2022

VIA ECF

Hon. Katharine H. Parker  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States District Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**APPLICATION GRANTED**

  
**Hon. Katharine H. Parker, U.S.M.J.**

**Re: Stephen Plumitallo v. Unum Group Corporation, No. 22-cv-1391**

**03/31/2022**

Dear Judge Parker:

We represent Defendant Unum Group Corporation in the above-captioned matter. We write to request an additional extension of time to answer, move against, or otherwise respond to the Complaint from April 21, 2022 to and including May 16, 2022. The extension would not affect any other scheduled dates.

On March 8, 2022, the Court ordered the parties to participate in an early mediation pursuant to Local Civil Rule 83.9. In issuing the Order, the Court observed that: "In the Court's experience, cases involving FLSA claims often benefit from early mediation."

On March 30, 2022, the parties had a productive preliminary call with Michael Kreitman, the Court-appointed Mediator. They discussed the fact that the instant complaint raises a number of important legal issues that may need to be addressed in a Rule 12 motion requiring significant motion practice. The parties agreed that before incurring this additional expense, it would be better to explore further the possibility of an early settlement. Mediation is scheduled for May 3, 2022, which is after the current April 21, 2022 deadline for Defendant to respond to the Complaint. Accordingly, the parties seek a brief extension to allow time to exchange proposals and participate in mediation before engaging in motion practice. The initial Scheduling Conference is scheduled for May 17, 2022, so if the matter is not resolved, any Rule 12 Motion will be on file prior to that date.

This is Defendant's second request for an extension of time. Plaintiff's counsel has represented that Plaintiff consents to the extension.

Respectfully submitted,



Patrick W. Shea  
of PAUL HASTINGS LLP

PWS:jmg